

BARRACK, RODOS & BACINE

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF WORCESTERSHIRE
COUNTY COUNCIL TO SECURITIES LEAD
PLAINTIFF'S OBJECTION TO
REORGANIZED DEBTORS' MOTION TO
APPROVE SECURITIES ADR AND
RELATED PROCEDURES FOR
RESOLVING SUBORDINATED
SECURITIES CLAIMS [D.I. 9189]**

1 Worcestershire County Council, the holder of a Securities Claim¹ and a creditor in the
2 chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-captioned reorganized
3 debtors (the “**Debtors**”, or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”), by
4 and through its undersigned counsel, submits this joinder (“**Joinder**”) to *Securities Lead*
5 *Plaintiff’s Objection to Reorganized Debtors’ Motion to Approve Securities ADR and Related*
6 *Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189] (the “**Securities**
7 **ADR Objection**”), in opposition to *Reorganized Debtors’ Motion to Approve Securities ADR*
8 *and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 8964] (the
9 “**Securities ADR Motion**”). In support of this Joinder, Worcestershire County Council,
10 respectfully states as follows:

11 **JOINDER AND RESERVATION OF RIGHTS**

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13 1. Worcestershire County Council is a Securities Claimant and timely filed proofs of
14 claim against the Debtors by the Extended Bar Date (Claim Nos. BA#A#27423 and
15 #CJGZ27423).

16 2. Worcestershire County Council incorporates by reference and hereby joins in all
17 arguments set forth in the Securities ADR Objection.

18 3. Worcestershire County Council reserves its right to supplement this Joinder and
19 further reserves its rights to participate in any hearing to consider the Securities ADR Motion,
20 including its rights to make any arguments and to examine witnesses.

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26 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
28 applicable.

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CONCLUSION

For all of the foregoing reasons, Worcestershire County Council respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

BARRACK, RODOS & BACINE

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